

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

1. GREAT LAKES INSURANCE SE,)	
)	
Plaintiff,)	
)	Case No. CIV-22-00702-JD
vs.)	Judge Jodi W. Dishman
)	
2. FREDY VALLE d/b/a VALLE)	
TRUCKING;)	
3. SILVER STAR CONSTRUCTION)	
COMPANY, INC.;)	
4. TYLON MACKEY;)	
5. ISRAEL JUAREZ; 5:22-CV-00702-JD)	
6. ORD TRUCKING, INC.)	
7. ZURICH AMERICAN INS. CO.,)	
)	
Defendants,)	
)	
<hr style="width: 40%; margin-left: 0;"/>		
8. ZURICH AMERICAN INS. CO.,)	
)	
Defendant/Third Party)	
Plaintiff,)	
)	
vs.)	
)	
9. PROGRESSIVE NORTHERN INS.)	
CO.,)	
)	
Third-Party Defendant.)	

**DEFENDANT/THIRD-PARTY PLAINTIFF ZURICH AMERICAN INSURANCE
COMPANY’S OBJECTIONS TO PLAINTIFF’S FINAL EXHIBIT LIST**

Defendant/Third-Party Plaintiff Zurich American Insurance Company (“**ZAIC**”), pursuant to the Court’s Scheduling Order (Doc. No. 56), respectfully submits its Objections to Plaintiff’s Final Exhibit List.

OBJECTIONS TO EXHIBITS

No.	Description	Objection
1.	Insurance Policy issued to Valle Trucking by Great Lakes	No objection.
2.	Reservation of Rights issues to Valle Trucking	No objection.
3.	Reservation of Rights issued to Silver Star	No objection.
4.	First contact letter from Great Lakes to Valle Trucking	No objection.
5.	Notice of claim from Zurich Insurance	No objection.
6.	Official Oklahoma Traffic Collision Report	No objection.
7.	Deposition of Israel Juarez	Federal Rules of Evidence 801, 803
8.	Hauling Agreement between Silver Star and Valle Trucking	No objection.
9.	Letter from J Chris Horton to Jeffrey Curran re Demand for Defense	No objection.
10.	Insurance Policy issued to Silver Star by Zurich Insurance	No objection.
11.	Insurance Policy issued to Valle Trucking by Progressive	No objection.
12.	Pleadings, discovery documents, and file of Underlying Lawsuit	Not identified with sufficient specificity to allow for objections at this time. Objection reserved until produced.
13.	Complaint, Initial Disclosures, as filed	Not a proper exhibit. Federal Rules of Evidence 401, 402, 403, 801, 803
14.	Discovery responses produced by Defendants, to the extent not objected to by Plaintiff	Not identified with sufficient specificity to allow for objections at this time. Objection reserved until produced.
15.	Demonstrative timeline of relevant events and communications	Not identified with sufficient specificity to allow for objections at this time. Objection reserved until produced.
16.	Additional exhibits identified during remaining discovery, to the extent not objected to by Plaintiff	Not identified with sufficient specificity to allow for objections

No.	Description	Objection
		at this time. Objection reserved until produced.
17.	Exhibits identified by Defendant, to the extent not objected to by Plaintiff	Not identified with sufficient specificity to allow for objections at this time. Objection reserved until produced.

Respectfully Submitted,

ASTON | MATHIS | CAMPBELL PLLC

By s/Amy E. Hampton

RACHEL C. MATHIS, OBA #16360

AMY E. HAMPTON, OBA # 20235

2642 East 21st Street, Suite 250

Tulsa, OK 74114

(918) 949-9966

FAX: (918) 949-9968

E-Mail: rmathis@amlawok.com

ahampton@amlawok.com

Attorney for Plaintiff Zurich American Insurance Company

CERTIFICATE OF SERVICE

I, Amy E. Hampton, hereby certify that on this 25th day of September, 2023, a true and correct copy of the foregoing document was served upon the following via the Court's electronic notification system:

Michael S. Linscott
Doerner, Saunders, Daniel & Anderson, L.L.P.
Two West Second Street, Suite 700
Tulsa, OK 74103-3117
Attorney for Great Lakes Insurance SE

Brian M. Keester
Doerner, Saunders, Daniel & Anderson, L.L.P.
2 West Second Street, Suite 700
Tulsa, OK 74103-3117
Attorney for Great Lakes Insurance SE

Emily E. Allan
Doerner, Saunders, Daniel & Anderson, L.L.P.
210 Park Avenue, Suite 1200
Oklahoma City, OK 73102
Attorney for Great Lakes Insurance SE

Mark A. Warman
Levinson, Smith & Huffman, P.C.
1743 South 71st Street
Tulsa, OK 74136-5108
Attorney for Israel Juarez

J. Chris Horton
J. Chris Horton, PC
PO Box 576
El Reno, OK 73036
Attorney for Silver Star Construction Company, Inc.

James A. Scimeca
Burch, George & Germany
1500 City Place Bldg.
204 N. Robinson, Ste 1500
Oklahoma City, OK 73102
Attorney for Tylon Mackey

Ryan Polchinski
Law Offices of Daniel M. Davis
300 N. Walnut Ave.
Oklahoma City, OK 73104
Attorney for Tylon Mackey

Andrew Polchinski
Law Offices of Daniel M. Davis
300 N. Walnut Ave.
Oklahoma City, OK 73104
Attorney for Tylon Mackey

Bradley E. Bowlby
Starr, Begin & King, PLLC
1800 South Baltimore, Suite 550
Tulsa, OK 74119
Attorney for Progressive Northern Insurance Company

J. Mark McAlester
Fenton, Fenton, Smith, Reneau & Moon, P.C.
211 North Robinson, Ste 800N
Oklahoma City, OK 73102-7106
Attorney for Berkshire Hathaway Homestate Ins. Co.

Christopher C. King
Starr, Begin & King, PLLC
1800 South Baltimore, Suite 550
Tulsa, OK 74119
Attorney for Progressive Northern Ins. Co.

s/Amy E. Hampton
AMY E. HAMPTON

AEH/aeh